

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TRISTAR INVESTORS, INC.,

Plaintiff,

V.

**AMERICAN TOWER CORPORATION,
et al.,**

Defendants.

CIVIL ACTION NO. 3:12-CV-499-M

AMERICAN TOWER, LLC, et al.,

Counter-Plaintiffs,

V.

TRISTAR INVESTORS, INC.,

Counter-Defendant.

**TRISTAR'S OPTIONAL COMPLETENESS DESIGNATIONS TO THE AMERICAN
TOWER ENTITIES' COUNTER-DESIGNATIONS**

TriStar Investors, Inc. hereby files its optional completeness designations in response to the American Tower Entities' Counter-Designations (Doc. 346) as follows:

1. Berry, Brenda (deposed March 20, 2013)

Page	Line	Page	Line
11	19	11	20
23	22	23	23
122	19	122	21
127	21	127	22
175	1	175	3
175	5	175	8
191	12	191	19
192	25	193	7

2. Cook, Michael (deposed January 28, 2013)

Page	Line	Page	Line
25	1	25	6
25	10	25	11
41	12	42	13
54	12	54	21

3. Crocker, Neil (deposed March 22, 2013)

Page	Line	Page	Line
79	7	79	10
176	11	176	17
177	15	177	20
255	25	256	6

4. Deas, Kenneth (deposed July 3, 2013)

Page	Line	Page	Line
12	2	12	23

5. Dobbas, Pamela (deposed June 5, 2013)

Page	Line	Page	Line
44	5	44	13

6. Dussack, Lawrence (deposed May 17, 2013)

Page	Line	Page	Line
37	10	37	14
38	1	38	2
38	4	38	4

7. Elliott, Suzanne (deposed July 1, 2013)

Page	Line	Page	Line
9	13	10	2
32	13	32	15
32	19	32	21

8. Fischer, Erin (deposed August 9, 2013)

Page	Line	Page	Line
19	16	19	17

9. Flint, Harry (deposed May 22, 2013)

Page	Line	Page	Line
80	17	80	18
80	22	80	25

10. Grant, Marc (deposed May 30, 2013)

Page	Line	Page	Line
23	16	23	17
34	23	35	2
65	23	66	5
66	9	66	18

11. Hartdorn, Jeffery (deposed February 6, 2013)

Page	Line	Page	Line
49	14	49	18
59	14	59	19
61	20	62	5
74	3	74	15
74	19	75	6
75	18	75	23
95	5	95	14
102	19	103	5
110	25	111	9
112	3	112	21
124	5	124	12
124	19	125	5
143	22	144	6

12. Hirsch, Jason (deposed March 5, 2013)

Page	Line	Page	Line
51	18	51	22
52	14	52	16
57	13	58	1
59	16	59	23
120	5	121	5
124	7	124	8
124	10	124	17
175	14	175	17
175	22	175	23
176	20	176	23
178	5	178	5

178	7	178	19
200	19	201	7
204	2	204	9
204	11	204	24
272	8	273	1

13. Isbell, Michael (deposed April 23, 2013)

Page	Line	Page	Line
19	20	20	2
22	10	22	15
30	11	30	13
40	25	41	21
62	10	62	16
69	16	70	3
70	5	71	1
71	3	71	9
72	22	72	25
73	2	73	10
74	22	75	13
75	15	75	18

14. Johnson, Jeremiah (deposed March 21, 2013)

Page	Line	Page	Line
31	25	32	9
57	15	57	18
99	24	100	8
100	10	100	15
100	17	100	21

15. Johnson, Kenneth (deposed May 3, 2013)

Page	Line	Page	Line
31	24	32	5
32	13	32	23
34	14	34	16
34	23	34	25
46	1	46	12
47	9	47	13

16. Jones, Paulette (deposed June 18, 2013)

Page	Line	Page	Line
-------------	-------------	-------------	-------------

Page	Line	Page	Line
8	2	8	3

17. Kearns, Mark (deposed March 19, 2013)

Page	Line	Page	Line
138	18	139	7
140	24	141	13
145	11	145	24
149	20	150	16

18. Kiszka, Linda (deposed January 22, 2013)

Page	Line	Page	Line
24	7	24	9
34	14	34	20
40	13	40	14
43	4	43	6
43	9	43	13
46	20	47	1
50	16	50	23
51	20	52	16

19. Krumbein, Michael (deposed February 5, 2013)

Page	Line	Page	Line
37	19	38	3
39	2	39	7
53	17	53	24
61	24	62	11
62	13	62	13
62	15	62	20
62	22	62	23

20. Loftus, Eric (deposed April 11, 2013)

Page	Line	Page	Line
20	16	20	22
42	4	42	14
62	10	62	23
81	3	81	22

21. Macheras, Alexander (deposed April 19, 2013)

Page	Line	Page	Line
90	8	90	22

22. Maniaci, Piero (deposed March 7-8, 2013)

Page	Line	Page	Line
39	20	39	25
40	2	40	3
40	22	42	13
48	15	48	25

23. McNiel, Rob (deposed May 29, 2013)

Page	Line	Page	Line
26	1	26	7
44	9	44	19
131	11	131	18
131	20	132	5
132	7	132	8
132	10	132	13
132	20	132	21
137	18	138	5
162	19	162	25
257	19	257	20

24. Myers, Ben (deposed March 6, 2013)

Page	Line	Page	Line
98	2	98	9
98	11	98	11
126	19	127	9
303	5	303	11
304	2	304	5
305	7	305	11
363	7	363	18
364	13	364	15

25. Nguyen, Tinh (deposed January 28, 2013)

Page	Line	Page	Line
10	1	10	3
15	6	15	9
15	15	15	16

Page	Line	Page	Line
16	25	16	25
17	2	17	3
17	13	18	5
50	4	50	7
58	22	61	5
63	1	63	3
64	9	64	10
64	12	64	12
61	14	64	16
74	18	74	18

26. Noel, Eugene (Bud) (deposed May 21, 2013)

Page	Line	Page	Line
56	20	56	22
56	25	57	2
102	8	103	1
103	4	103	5
103	7	103	14

27. Noland, Stacey (deposed May 21, 2013)

Page	Line	Page	Line
18	13	18	14
32	6	32	14

28. Osborne, Randall (deposed April 24, 2013)

Page	Line	Page	Line
23	1	23	2
23	6	23	9
25	7	25	9
25	11	25	13
27	10	27	14
27	21	27	22
27	24	28	16
29	5	29	9
31	4	31	6
37	18	37	20
37	22	38	3
40	22	40	25
44	2	44	12
51	14	52	3
52	12	52	17

Page	Line	Page	Line
53	24	54	13

29. Paul, Justine (deposed March 7, 2013)

Page	Line	Page	Line
30	9	30	12
52	20	53	1
97	22	97	25
98	2	98	6
119	3	119	19
184	3	184	3
184	9	184	13

30. Paxton, Lowell (deposed May 2, 2013)

Page	Line	Page	Line
21	22	21	23
25	14	25	17
35	14	35	22
64	8	64	10
83	12	83	23
84	2	84	4

31. Pell, Richard (deposed May 3, 2013)

Page	Line	Page	Line
41	12	41	23

32. Prescott, Christopher (deposed May 9, 2013)

Page	Line	Page	Line
46	7	46	12
46	15	47	4
49	23	49	23
49	25	50	1
84	15	85	12
113	6	113	8
113	11	114	13
114	15	114	18
114	23	115	3

33. Puleo, John (deposed April 11, 2013)

Page	Line	Page	Line
9	14	9	18

18	24	18	25
19	3	19	3
48	4	48	20
49	8	49	15
70	9	70	17
71	1	71	19
91	19	91	23
91	25	92	5
92	7	92	23

34. Reeves, Jacob (deposed May 20, 2013)

Page	Line	Page	Line
11	2	11	9
22	14	22	17
62	2	62	4
63	7	63	9
68	7	68	9
69	20	69	23

35. Reynolds, Cheryl (deposed May 20, 2013)

Page	Line	Page	Line
31	25	32	3
70	16	70	17
70	19	70	23
91	2	91	5
91	9	91	11
107	8	108	5
109	10	109	19
110	10	110	14
110	19	110	22
111	19	111	22
111	25	112	5
112	9	112	9
112	11	112	15
121	3	121	4
121	8	121	10
136	9	136	15
152	24	153	15

36. Rosa, Anthony (deposed April 12, 2013)

Page	Line	Page	Line
115	7	115	10
115	16	115	17

250	5	250	12
-----	---	-----	----

37. Rosenquest, Margaret (deposed June 17, 2013)

Page	Line	Page	Line
18	19	18	24
23	10	23	13
35	1	35	5
35	7	35	7
35	13	35	14
50	8	50	19
50	21	51	6
52	3	52	6
52	8	52	9

38. Smith, Robert (deposed May 8, 2013)

Page	Line	Page	Line
27	8	27	10
27	13	27	13
28	15	28	22
31	5	31	21
43	19	43	24
44	3	44	17

39. Taiclet, James (deposed August 2, 2013)

Page	Line	Page	Line
31	17	31	20
31	22	31	22
31	25	32	3
38	1	38	1
63	14	63	15
63	17	63	19
63	22	64	4
64	8	64	14
71	1	71	20
72	1	72	7
97	7	97	18
98	4	98	5
98	9	99	4
112	18	113	14
116	8	117	6
119	4	119	11
129	18	131	3
188	5	188	10

Page	Line	Page	Line
189	3	189	4
202	24	203	10
203	14	203	19
205	23	206	2

40. Thiel, Bruce (deposed January 30, 2013)

Page	Line	Page	Line
67	18	68	1
68	10	69	4
72	18	72	22
79	3	79	5
79	7	79	10
79	12	79	19
79	21	79	22
80	18	81	16
83	5	83	11

41. Thornton, Bonnie (deposed May 7, 2013)

Page	Line	Page	Line
19	15	19	17
19	20	19	22
21	16	22	2
22	5	22	5

42. Willock, Karl (deposed August 15, 2013)

Page	Line	Page	Line
14	21	15	8
27	11	27	21

43. York, Denny (deposed April 18, 2013)

Page	Line	Page	Line
20	24	21	5
26	14	26	17
26	19	26	19
36	10	37	5
40	21	40	22
40	25	41	7
46	13	46	25

VINSON & ELKINS L.L.P.

/s/ Matthew R. Stammel

William D. Sims, Jr.

Texas Bar No. 18429500

Thomas S. Leatherbury

Texas Bar No. 12095275

Matthew R. Stammel

Texas Bar No. 24010419

John D. Taurman

Texas Bar No. 19680400

Kyle D. Young

Texas Bar No. 24070899

Tyler J. Bexley

Texas Bar No. 24073923

2001 Ross Avenue, Suite 3700

Dallas, TX 75201-2975

Tel: 214.220.7700

Fax: 214.220.7716

bsims@velaw.com

tleatherbury@velaw.com

mstammel@velaw.com

jtaurman@velaw.com

kyoung@velaw.com

tbexley@velaw.com

Harry M. Reasoner

Texas Bar No. 16642000

Stacey Neumann Vu

Texas Bar No. 24047047

1001 Fannin Street, Suite 2500

Houston, TX 77002

Tel: 713.758.2222

Fax: 713.758.2346

hreasoner@velaw.com

svu@velaw.com

Attorneys for TriStar Investors, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2014, I served a true and accurate copy of the foregoing document on all counsel of record via filing of the same with the Court's CM/ECF system.

/s/ Kyle D. Young